

EXHIBIT 1

I. Plaintiffs respectfully request that the following facts be established for purposes of this action:

A. Defendant Kline

1. Defendant Kline was a member of Identity Evropa from April 2017 through at least August 2017.
2. Defendant Kline was one of the leaders of Identity Evropa from April 2017 through at least August 2017.
3. Defendant Kline entered into an agreement with one or more co-conspirators to plan the Unite the Right event that took place in Charlottesville, Virginia on August 11 and 12, 2017.
4. Defendant Kline entered into an agreement with one or more co-conspirators to engage in racially motivated violence in Charlottesville, Virginia on August 11, 2017.
5. Defendant Kline entered into an agreement with one or more co-conspirators to engage in racially motivated violence at the Unite the Right event in Charlottesville, Virginia on August 12, 2017.
6. Defendant Kline was motivated by animus against racial minorities, Jewish people, and their supporters when conspiring to engage in acts of intimidation and violence on August 11 and 12, 2017 in Charlottesville, Virginia.
7. It was reasonably foreseeable to Defendant Kline and intended by him that co-conspirators would commit acts of racially-motivated violence and intimidation at the torch light event in Charlottesville, Virginia on August 11, 2017.

8. It was reasonably foreseeable to Defendant Kline and intended by him that co-conspirators would commit acts of racially-motivated violence and intimidation at the Unite the Right event in Charlottesville, Virginia on August 12, 2017.
9. It was reasonably foreseeable to Defendant Kline and intended by him that a co-conspirator would engage in racially-motivated violence by intentionally driving a car into a crowd of counter-protestors on August 12, 2017.
10. Defendant Kline committed multiple overt acts in furtherance of the conspiracy he entered into to commit racially-motivated violence at the Unite the Right event in Charlottesville.
11. Defendant Kline attended the torch light march on August 11, 2017 and committed acts of intimidation and violence in furtherance of the conspiracy.
12. Defendant Kline attended the Unite the Right event on August 12, 2017 and committed acts of intimidation and violence in furtherance of the conspiracy.
13. After the Unite the Right event in Charlottesville, Virginia on August 11 and 12, 2017, Defendant Kline ratified the racially-motivated violence that occurred at the event.

B. Defendant Heimbach

14. Defendant Heimbach was a member of Traditionalist Worker Party from April 2017 through at least August 2017.
15. Defendant Heimbach was the leader of Traditionalist Worker Party from April 2017 through at least August 2017.
16. Defendant Heimbach entered into an agreement with one or more co-conspirators to plan the Unite the Right event that took place in Charlottesville, Virginia on

August 11 and 12, 2017.

17. Defendant Heimbach entered into an agreement with one or more co-conspirators to engage in racially motivated violence in Charlottesville, Virginia on August 11, 2017.
18. Defendant Heimbach entered into an agreement with one or more co-conspirators to engage in racially motivated violence at the Unite the Right event in Charlottesville, Virginia on August 12, 2017.
19. Defendant Heimbach was motivated by animus against racial minorities, Jewish people, and their supporters when conspiring to engage in acts of intimidation and violence on August 11 and 12, 2017 in Charlottesville, Virginia.
20. It was reasonably foreseeable to Defendant Heimbach and intended by him that co-conspirators would commit acts of racially-motivated violence and intimidation at the torch light event in Charlottesville, Virginia on August 11, 2017.
21. It was reasonably foreseeable to Defendant Heimbach and intended by him that co-conspirators would commit acts of racially-motivated violence and intimidation at the Unite the Right event in Charlottesville, Virginia on August 12, 2017.
22. It was reasonably foreseeable to Defendant Heimbach and intended by him that a co-conspirator would engage in racially-motivated violence by intentionally driving a car into a crowd of counter-protestors on August 12, 2017.
23. Defendant Heimbach committed multiple overt acts in furtherance of the conspiracy he entered into to commit racially-motivated violence at the Unite the

Right event in Charlottesville.

24. Defendant Heimbach attended the Unite the Right event on August 12, 2017 and committed acts of intimidation and violence in furtherance of the conspiracy.

25. After the Unite the Right event in Charlottesville, Virginia on August 11 and 12, 2017, Defendant Heimbach ratified the racially-motivated violence that occurred at the event.

II. Plaintiffs respectfully request that all documents Plaintiffs have a good faith basis to believe were in fact created by Defendants Kline or Heimbach be deemed “authentic” for purposes of satisfying Rule 901 of the Federal Rules of Evidence. In particular, Plaintiffs have a good faith basis to believe that the following social media accounts, identified by the platform name, followed by the handle (or username), belong to Defendants Kline and Heimbach, respectively. Plaintiffs respectfully request that all documents from the following social media accounts be deemed “authentic” for purposes of satisfying Rule 901 of the Federal Rule of Evidence:

A. Defendant Kline

1. Discord - Eli Mosley#5269
2. Discord - Sayer
3. Discord - Sayer#5269
4. YouTube - Eli Mosley
5. Facebook - Eli Mosley
6. Twitter - @EliMosleyIE
7. Twitter - @ThatEliMosley
8. Twitter - @EliMosleyOH

9. Twitter - @EliMosleyIsBack
10. Twitter - @Sheli_Shmosley
11. Twitter - @Eli_Mosley_
12. Gab - @EliMosley

B. Defendant Heimbach

1. Discord - MatthewHeimbach
2. Discord - MatthewHeimbach#4345
3. Twitter - @HeimbachMatthew
4. Twitter - @MatthewHeimbach
5. VK - MatthewHeimbach
6. Facebook - Matthew Heimbach
7. Facebook - Matthew Warren
8. Gab - @MatthewWHeimbach
9. Gab - @ActualMatthewHeimbach